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9 **and WATCHDOG AI, INC.**

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19 **PARAMOUNT GLOBAL**

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 JOSEPH RAYHBUCK p/k/a FAT CODA
23 STUDIOS, an individual, and
24 WATCHDOG AI, INC., a California
25 corporation,

26 Plaintiffs,

27 v.

28 PARAMOUNT GLOBAL, a Delaware
corporation,

Defendant.

CASE NO: 2:25-cv-01605-JLS-AJR_x

**STIPULATION TO ORDER
DISMISSING ACTION WITHOUT
PREJUDICE**

[Proposed] Order submitted herewith

*Assigned to the Hon. Josephine L.
Staton*

Action Filed: February 25, 2025

Plaintiffs JOSEPH RAYHBUCK p/k/a FAT CODA STUDIOS and
WATCHDOG AI, INC. (collectively, "Plaintiffs") and Defendant PARAMOUNT

GLOBAL (“Defendant”), through their respective counsel, hereby enter the following stipulation respecting Plaintiff’s filing of a First Amended Complaint and Defendant’s filing of a response thereto. This Stipulation is based upon the following:

WHEREAS, Plaintiffs filed their initial Complaint on February 25, 2025 (Dkt. 1);

WHEREAS, Plaintiffs effected service of the Complaint on Defendant on March 4, 2025 (Dkt. 15); and

WHEREAS, Plaintiffs and Defendant have reached a settlement and have executed the settlement agreement.

WHEREAS, Plaintiffs are awaiting payment which the Parties expect to occur on or before August 8, 2025 at which time the parties expect to enter a proposed dismissal with prejudice order.

Based on the foregoing, the parties hereby stipulate as follows:

1. Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the parties, through their respective attorneys of record, stipulate to the entry of the accompanying Order dismissing this action, (1) without prejudice, and with Plaintiffs, on the one hand, and Defendant, on the other hand, to bear their respective attorneys’ fees and costs, and (2) with the Court to retain jurisdiction pending the parties’ completion of their settlement terms and filing of a Stipulation and Proposed Order of dismissal with prejudice.

Dated: July 14, 2025

VALKYRIE LAW GROUP, P.C.

HEATHER L. BLAISE, ESQ.

By: /s/ Heather L. Blaise

Attorneys for Plaintiffs

Dated: July 14, 2025

KATTEN MUCHIN ROSENMAN LLP

DAVID HALBERSTADTER

By: /s/ David Halberstadter

Attorneys for Defendant

1 I, Heather L. Blaise, hereby attest that all other signatories listed above, on
2 whose behalf this filing is submitted, concur in the filing's content and have authorized
3 the filing.
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